

REMARKS

The assertion that the specification does not enable application software is unsupportable. The suggestion that the word "applications" in the specification does not support application software in the claims is based on either a misplaced technical assertion or a misplaced legal assertion. Legally, there is no requirement that the claims and the specification use the same words. Technically, applications refer to a type of software which can also be called application software.

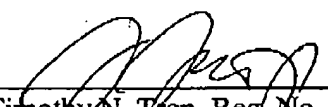
Therefore, on either basis, the Section 112 rejection is unsupportable and should be withdrawn. As further proof, the definition of "application" from the Microsoft Press Computer Dictionary, Third Edition, is attached. That document indicates that an application is a program design to assist in the performance of a specific task, such as word processing, accounting, or inventory management. A program and software are the same thing, as one skilled in the art would surely appreciate.

With respect to the rejection that there is no antecedent basis for the mobility management state being idle, the claim has been amended to recite a mobility management state. There is no requirement that the claim specify that the mobility management state is determined. None of the references cited teach shutting down applications when the mobility management state is idle. No reference teaches doing anything in view of the mobility management state. In fact, this is conceded by the office action with respect to the reference to Ferene and, therefore, reliance on Ferene is not understood.

As pointed out previously, the reference to Kalliokulju only teaches a state where paging signaling is not conducted, because it cannot be, because there is no connection to the network. To assert that this teaches doing something in a particular mobility management state is unsupportable.

Respectfully submitted,

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